



## Conflict of Interest Policy

Policy no:	<b>4.4</b>
Version date	November 2025
Responsible Person	Head of Compliance
Approved by	Senior Management Team
Version number	V03
Next review due	November 2026
External reference points	Under the Office for Students Condition E2 Management and governance: <i>the provider maintains a public register of conflicts of interest and such conflicts are appropriately managed in practice</i> (OfS Regulatory Framework, 24-11-2024, p168).

Version Control			
Previous Version	New Version	Date	Update/Notes
V1 (06-05-25)	V2	01-08-25	Organisation is now solely referred to as Trent Education Centre or TEC.
			The Head of Compliance rather than the Secretary of the Board of Governors maintains the Declaration of Shared Interests.
			Finance Committee now disbanded has been changed to the Executive Finance Committee.
			Register of Declared Interests held by the Head of Compliance.
			Audit and Risk Committee annual review of conflict of interest at TEC.
			New Declaration of Interest Form and value for money statement.
V2 (01-08-25)	V3	18/11/25	Clarification that the Secretary of the BoG received

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## 1. Introduction

This policy demonstrates the commitment of Trent Education Centre (TEC) to upholding high ethical standards and maintaining the confidence of its students, faculty, stakeholders and the wider community. It defines the responsibilities of the Board of Governors, the Senior Management Team, faculty, staff, and students, to act in the best interests of TEC and its stakeholders. It outlines the procedures for identifying, disclosing, and managing conflicts of interest amongst stakeholders within TEC community, and prevents situations where personal interests or relationships could interfere with TEC's decision-making processes, jeopardise its reputation, or create unfair advantages for individuals associated with TEC. By adhering to this policy and its procedures, TEC can ensure that decisions are made with integrity and objectivity.

## 2. Purpose and Scope

A robust Conflict of Interest Policy prevents unethical behaviour and promotes a culture of trust, transparency, and accountability within TEC. It mitigates the risk of legal cases being brought against TEC or its stakeholders and prevents reputational damage to TEC from unresolved conflicts. It safeguards the impartiality of TEC by ensuring that stakeholders identify their interests and recognise if there are instances where the decisions or actions of a person or persons may be influenced by opportunities for personal gain. If there are not any actual conflicts of interest identified, there may be a potential or even a perception of conflicts that need to be managed effectively. By setting clear and fair expectations and mechanisms for identifying, disclosing, and managing conflicts of interest, this policy sets out the consequences for non-compliance, and ensures that decisions are made in the best interests of TEC as a whole.

This Policy is applicable to all Trent Education College employees, as well as students and individuals from outside TEC who are members of College Committees or participate in any other activities associated with TEC, including visits to external organisations, exchange programmes, foreign trips, procurement of goods and services, construction, renovation or maintenance activities and investment of funds. The list of activities is not exhaustive, and all of the situations in which conflicts may occur cannot be predicted.

TEC expects all staff to act in the best interests of TEC with integrity and honesty and must avoid situations where their personal interests may conflict with their role at College.

Individuals are expected to identify circumstances where a conflict of interest could reasonably occur and to report these instances to appropriate staff at TEC by following the procedures outlined in this Policy. If any TEC stakeholder is uncertain about whether a disclosure is necessary, they should consult their line manager or a member of the Senior Management Team. Senior Management Team members, in turn, may refer to the Audit and Risk Committee or the Board of Governors for further guidance.

TEC recognises that its members may have various outside interests, such as other jobs, consulting positions, roles on charity boards, or membership of various other organisations including public bodies. This policy does not prevent individuals from having outside interests such as these unless restrictions have been stipulated in an employee's contract of employment. However, this policy ensures that any conflicts of interest are acknowledged, disclosed, and appropriately managed.

The Senior Management Team is responsible for the implementation and monitoring of this policy, including the maintenance of TEC's Register of Disclosed Conflicts of Interests and their mitigations, which the SMT delegates to the Head of Compliance.

### 3. Aims and Objectives

This policy aims to ensure that all TEC stakeholders manage any interests they may have outside of TEC, which could conflict with TEC's interests. It also ensures they manage how their interests may be perceived by others. Even if there is no conflict, it is best to declare an interest so that it does not appear as if someone is trying to hide something from others. This policy has the following objectives:

- To provide clear information on what constitutes a conflict of interest
- To provide a clear process for all staff to declare their interests
- To ensure there all members of boards and committees understand their obligation to declare interests and to pass these to the Head of Compliance where they may be recorded on the Register of Declared Interests.
- To ensure that the Senior Management Team understands how to mitigate conflicts of interest before individual join boards and committees.
- To ensure that chairs and secretaries of all boards and committees understand how and when to mitigate conflicts of interest during meetings.

### 4. Definition and Examples of Conflict of Interest

A **conflict of interest** occurs when an individual's obligations to TEC clash with their personal, financial, or other interests, or with the interests of someone close to them. It is irrelevant if an individual is swayed by these interests; what matters is whether they could be perceived as affecting their ability to make impartial decisions on behalf of TEC.

A **perceived conflict of interest** occurs when an outsider may believe that an individual's loyalties or interests are divided. Even if the individual does not view the situation as a conflict, they should assess whether it could be seen that way by others. Perceived conflicts of interest must also be managed, reported, and logged.

A **potential conflict of interest** may arise when an individual's interests, although not conflicting at present, could lead to a conflict in the future.

There are many circumstances where conflicts of interest are possible. The following examples are not an exhaustive list:

- Someone may have an opportunity, or it may be perceived by others that they have an opportunity to exploit an interest for their own personal benefit or for the benefit of a close family member or friend.
- Someone may stand to benefit financially from a certain course of action or decision that is or needs to be taken.
- Someone may be able to gain a career opportunity or help someone close to them gain a career opportunity through their involvement in certain activities or associations.
- Someone may be able to enhance or damage the reputation of someone or TEC through their involvement in an activity or decision.
- Conflicts of interest may arise from external affiliations or dual roles within the TEC community, leading to potential conflicts in various areas such as procurement, research funding, and contractor selection.

Conflicts of interest can involve financial or non-financial considerations.

**Financial conflicts** may occur when there is a potential for personal financial gain, financial gain for a family member or close associate, or when it could be perceived that financial incentives might impact an individual's decisions. This can include payments, benefits, gifts, or other forms of financial gain.

**Non-financial conflicts** may involve personal or career advantages, improvements to education, or benefits to connected individuals. It is important for staff, board and committee members to carefully consider their actions and potential conflicting interests that could influence them or create the appearance of influence.

## Examples:

Conflicts of interest arise in various settings. The following list, which is not exhaustive, but provides examples of situations where there may be a conflict of interest:

- Staff are responsible for staff or student recruitment, and they know the individuals personally.
- Staff are responsible for line managing anyone they may be closely or personally related to in any way,
- A staff member responsible for assessments or examinations is in a compromising relationship with a student at TEC who is being assessed or taking an examination
- An individual employed by TEC or completing work on behalf of TEC has connections with individuals who are taking assessments or examinations at TEC.
- Performance appraisals and promotion of employees conducted by a close relative of the staff member being appraised or potentially offered promotion.
- A staff member is required to make a decision that may impact on a student or applicant with whom they have a close relationship. This may affect (but is not limited to) a student applying to join a course at TEC, taking an assessment, undergoing student disciplinary procedures or being awarded a prize.
- Staff, board or committee members have multiple roles that could influence decisions related to admissions, recruitment, and commercial transactions.
- A staff member who has a side business that offers similar services to those provided by TEC.
- A position involves both a business opportunity and a focus on quality and/or standards.
- A staff member or other stakeholder such as a member of the Board of Governors has a close relationship with someone who may be likely to sell something to TEC such suppliers and contractors.
- Acceptance or use of gifts and hospitality of a material nature from students, vendors, suppliers, and other persons regardless of the nature of gift.

There are other situations where a conflict of interest may arise such as the following:

If a member of a board of committee is involved in another organisation that may be involved in a business transaction with TEC. These other organisations may be charities, businesses, educational or political organisations. If a board or committee is required to make procurement decisions, members must declare such interests before a decision is taken and may need to step aside whilst then decision is taken. It may be necessary for the board of committee chair to be informed and for the minute-taker to record their declaration. **The minute-taker must pass the declarations from all Boards and Committees to the Head of Compliance, who maintains the Record of Declared Interests for all staff and stakeholders.**

The HR Manager must and all staff involved in staff recruitment must ensure that all their interests are declared and recorded in the Record of Declared Interests. Staff should not be involved in interviewing candidates who they have a close relationship to such as a family member. See the **Safe Recruitment Policy** for more information.

## **5. Declaring and Recording Conflicts of Interest**

### **5.1. Members of Staff**

The employment contract clause number 4 requires employees (full-time/part-time) to disclose any actual or potential conflict of interest. If an employee or other stakeholder has any conflict of interest, he/she should complete the Declaration of Interest form and submit it to the HR Manager, who will record it on TEC's staff management system, Bright HR. Staff should also submit a copy of the Declaration of Interest form to the Secretary of the Board of Governors, who maintains the Record of Disclosed Conflicts of Interest.

Staff who do not have any conflicts of interest to declare are not required to complete the Declaration of Interest Form.

### **5.2. Board and Committee Members**

Members of the following Boards and Committees must submit an annual Declaration of Interest form to the minute-taker or chair of their respective board or committee and to the Secretary of the Board of Governors, who passes it to the Head of Compliance. The Head of Compliance maintains the Register of Disclose Conflicts of Interest and their mitigations.

- Board of Governors
- Audit and Risk Committee
- Remunerations Committee
- Executive Finance Committee
- Senior Management Team

Those who are members of more than one of the above Boards or Committees will only be required to submit one Declaration of Interest form per annum.

### **5.3. Agenda Standing Item**

Declarations of interest must be on the agenda as a standing item at the start of all Board and Committee meetings. This allows members and other attendees to disclose any conflicts, actual or perceived, that may be related to the agenda items of the meeting. Board and Committee members are required to notify the Chair whenever a change arises that could lead to a potential conflict of interest.

When a conflict is declared, the Chair will determine the appropriate course of action for the member involved. Options include:

- Recusing themselves entirely from the board or committee if the conflict is substantial or persistent
- Stepping back from the decision-making process for the item in question.
- Remaining present during the relevant item but refraining from contributing to the discussion.
- Participating fully in discussions and decisions without limitations.

If the Chair themselves has a conflict, the board or committee should appoint the Vice or Deputy Chair or another suitable member to lead the discussion for that item.

Additional procedures apply to Board members, including the Chair, regarding the handling of actual, potential, or perceived conflicts of interest and conflicts of loyalty.

#### **5.4. Conflict of Loyalty**

A conflict of loyalty may arise when a member's responsibility or allegiance to another individual or organisation could compromise their ability to act solely in TEC's best interests. Board of Governors members should remain alert to the possibility of bias and assess whether their roles in or for other organisations could result in real or perceived partiality in decision-making at TEC.

#### **5.5. Recording Declarations of Interest**

All declarations and any steps taken to mitigate conflicts must be recorded in the meeting minutes. These records should be submitted to the Head of Compliance, who maintains the official Register of Disclosed Conflicts of Interest.

**If their interests change, staff are obligated to report it immediately to appropriate staff. If in doubt, they should inform the Head of Compliance who maintains the Record of Declared Interests.**

No staff member or Board/Committee participant should engage in decision-making activities such as recruitment panels without first declaring their relevant interests. While it is primarily the responsibility of the individual to disclose such interests, other stakeholder within TEC who becomes aware of a potential conflict should encourage the individual to make a formal declaration so that appropriate measures can be taken.

### **6. Managing Conflicts of Interest**

It is important for individuals to be aware of and actively manage any conflicts of interest to maintain integrity and trust within the institution. Open communication and a commitment to ethical behaviour are essential in addressing conflicts of interest effectively.

There must be an assessment of all actual or possible conflicts of interests even if there is only a perception of conflict. These need to be managed with mitigations determined by the Senior Management Team, which receives updates to the Register of Disclosed Conflicts of Interest from the Head of Compliance. The SMT reports on conflict of interest to the Board of Governors.

It may be adequate to declare an interest and others present may agree that there is no conflict related to that interest. On the other hand, it may be necessary to take steps to manage the interest as follows:

- Declaring an interest publicly or to someone in another organisation
- Giving up a financial interest
- Giving up participation in a particular activity
- Exclusion from discussion about a decision to be taken
- Exclusion from voting for or against something
- Asking others to make decisions about something on your behalf
- Removing oneself from a position of authority or influence such as being someone's line manager

The declaration of interests of key stakeholders must be specifically assessed where they relate to the following types of decision:

Stakeholder	Activity requiring assessment of interests
HR Manager, specific line manager and other interview panel members	Staff Recruitment
Head of Higher Education, Programme Leader, Tutor, Assessor and Internal Verifier	Assessment and Examination
Head of Operations	Commercial decisions such as procurement
Existing members assess the interests of all Board and Committee members that have been disclosed in the Annual Declaration of Interest form.	Board of Committee Membership

The Senior Management Team on receipt of the update Register of Disclosed Conflicts of Interest from the Head of Compliance, with a supporting report, will decide what mitigating steps are necessary if any. They should decide on the appropriate action for each conflict disclosed to them, communicate this decision in writing to the person who disclosed the conflict, and ensure this is documented by the Head of Compliance in TEC's Register of Disclosed Conflicts of Interest. If the conflict is pertinent to the individual's involvement in another board or committee, the information may be shared with the Chair of that Committee or Board. In rare instances, such as with complex or disputed conflicts, the SMT chair may seek advice from the Audit and Risk Committee and/or the Board of Governors.

The Head of Compliance reviews all actions taken to mitigate conflicts of interest annually. The Head of Compliance also reviews and updates any mitigations when informed of any relevant changes of circumstance

Evaluating conflicts of interest can vary in terms of their significance and how explicit they may be. When determining the significance of a conflict of interest and the potential for bias, multiple factors should be considered. These factors may include, but are not limited to:

- The significance of the conflict, whether it is actual, potential, or perceived.
- The relationship between the conflicting interests.
- The impact that one interest may have on another interest.
- The importance of the issue being considered and the impact the decision taken may have
- How likely it is for the individual's other interest to influence TEC's decision.
- The level of involvement that the individual has or plans to have in TEC's decision-making process.

Appendix 3 gives examples of possible ways of managing different types of conflict.

## 7. Outcomes of Declared Interests

There are two possible outcomes when assessing a declaration of interest.

### 7.1. No Conflict Exists

The Senior Management Team may decide that no conflict exists in which case this is reported in the Register of Disclosed Conflicts of Interest with an explanation and any supporting evidence.

If the impact of an interest is too slight or the link between it and the matter at hand is too remote or tenuous that it cannot be regarded as a conflict of interest.

### 7.2. Conflict Does Exist

Once a conflict of interest is identified, the Senior Management Team will decide on the necessary steps to address the issue. These may include:

- Remain: be allowed to carry on if the conflict is deemed minor.
- Proceed with permission: request formal approval to participate (if legally allowed)
- Proceed with limitations or increased supervision: have their actions closely monitored in relation to the specific project.
- Step back: to refrain from discussing or deciding on the activity or course of action.
- Delegate: assign the decision, tasks, or responsibilities to others.
- Step aside: to remove oneself from any involvement in the project.

## 8. Stakeholders Responsibilities

### 8.1. Staff

Regardless of their role, staff are required to inform their line manager, the HR Manager or the Head of Compliance if they believe that they may have a conflict of interest that needs to be declared.

### 8.2. Board and Committee Members and Attendees

Anyone who is a member or attends one of the following Boards or Committees must declare their interests using the **Declaration of Interest Form** in the Appendices. This must include whether they have a relative or close contact that may lead to a conflict of interest or a perceived conflict of interest.

- Board of Governors
- Audit and Risk Committee
- Remunerations Committee
- Executive Finance Committee
- Senior Management Team

They must also be invited by the Chair to verbally declare any interests they may have at the start of each meeting. All members of Boards and Committees should inform the Chair as soon as they have a change in circumstances that may affect their interests.

### **8.3. The Head of Compliance**

The Head of Compliance is responsible for ensuring that all staff and students or external members of the TEC Board of Governors are made aware of this policy. The Head of Compliance is also responsible for ensuring that an up-to-date **Register of Declared Conflicts of Interests** is maintained.

### **8.4. The Senior Management Team (SMT)**

The SMT is responsible for determining how to manage each conflict of interest.

### **8.5. Board and Committee Chairs**

The Chair of each of the boards and Committee above must ensure that all members of their board or committee complete and submit the Declaration of Interest form in the Appendices. They must also ask all attendees to declare their interests at the start of the meeting. They need to encourage members to identify in there are any agenda items where they may have a conflict or perceived conflict of interest. The Chair must also ensure that minutes are taken of all declarations of interest including mitigations they may be implemented to manage conflicts of interest. The Chair must ensure that all declarations are passed to the Head of Compliance who maintains the Register of Declared Conflicts of Interest.

## **9. Monitoring Conflicts of Interest**

The Audit and Risk Committee (ARC) is responsible for conducting an annual review of conflicts of interest at TEC. This included reviewing the Register of Declared Interests and the mitigations in place for managing conflicts of interest. ARC provides an annual report on conflict of interest at TEC to the Board of Governors by the end of each calendar year.

## Appendix 1: Examples of the Management of Declared Interests

Situation	Who to declare to	Possible Mitigation Strategy
<p><b>Staff Recruitment</b></p> <p>An employee is invited to join an interview panel for the recruitment of staff and one of the candidates is a close relative or theirs.</p>	<p>HR Manager or the Chair of the Recruitment Panel.</p>	<p>If an employee has a relative as a candidate for a position, they must abstain from participating in the recruitment process and another staff member should take their place for this position.</p>
<p><b>Teaching and/or Assessment</b></p> <p>A faculty member whose relative or close friend is a student, and the faculty member is able to influence decisions about whether the student meets entry requirements for a course or has passed their assignments.</p>	<p>The Head of Higher Education</p>	<p>Inform the student that there has been a disclosure and that TEC will ensure the faculty member is not involved in any decisions regarding that student.</p>

Situation	Who to declare to	Possible Mitigation Strategy
<p><b>Becoming a Member of a Board or Committee</b></p> <p>A member of a board or committee who also offers guidance or contributes to boards and committees in other organisations.</p>	<p>The chair and secretary of the board or committee and the Head of Compliance who keeps the Register of Declared Interests.</p>	<p>Individuals must declare any potential conflicts in the Declaration of Interest Form. It is up to the board or committee chair to rule on whether the individual concerned may:</p> <ul style="list-style-type: none"> <li>• continue as a member</li> <li>• no longer continue as a member</li> <li>• continue as a member but recuse themselves for reserved matters</li> </ul>
<p><b>Board or Committee Meeting</b></p> <p><b>a)</b> A student representative on the committee who is also involved in a student organisation actively advocating for a policy connected to one of the agenda points.</p> <p><b>b)</b> A committee member who holds a personal or professional stake in a topic listed on the agenda.</p>	<p>The chair and secretary of the board or committee and the Head of Compliance who keeps the Register of Declared Interests.</p>	<p>At the beginning of a meeting the individual declares their interest and the chair will assess the situation and decide on suitable measures, which may include the conflicted participant:</p> <ul style="list-style-type: none"> <li>• opting out of both the discussion and decision-making related to the item; or</li> <li>• staying for the discussion but not taking part in the decision; or</li> <li>• remaining present for the entire item but abstaining from the decision.</li> </ul> <p>Details of the conflict and the action taken should be formally noted in the meeting minutes.</p>
<p><b>Accounts and Finance</b></p> <p>A TEC employee has decision-making powers over any transaction with a third party who is a family member or with whom they have an interest.</p>	<p>The Senior Management (SMT) Team</p>	<p>The employee should declare their interest to the Managing Director and recuse themselves from any decision-making over the transaction in question. They should also inform the Head of Compliance to update the Register of Declared Interests.</p>

## Appendix 2: Template for the Register of Declared Conflicts of Interest

TEC Stakeholder Name		Role		Ownership	
DOB		Tel:		Email	
	Company Number/ Charity/Details	Nature of Business	Conflict of Interest Assessment	Management/ Mitigation	Review Date
<b>Directorships</b>					
<b>Shareholdings</b>					
<b>Trusteeships</b>					
<b>Charities</b>					
<b>Professional Bodies</b>					
<b>Additional Interests</b>					
Employment					
Political Interests					
Public Appointments					
Other interests					
Gifts or Hospitality Received					

## Appendix 3: Declaration of Interest Form



### DECLARATION OF INTEREST FORM

#### Board of Governors

TEC upholds the highest standards of governance and academic management across all its activities. In line with this commitment, every member of the Board of Governors is expected to act with independent judgment, prioritising TEC's best interests. Decisions should be made free from undue external influence, and members must openly declare any real, perceived, or possible conflicts of interest.

This declaration is to be completed upon joining the Board of Governors and reviewed annually. Members are also asked to inform the **Head of Compliance** of any updates as they happen, ensuring the **Register of Declared Interests** remains current. Additionally, if a conflict of interest arises in relation to a meeting agenda item, members should notify the Secretary and the Head of Compliance via email before the meeting.

It is each member's responsibility to reflect on any personal interests, as well as those of their immediate family, that could present a conflict. The table below is provided to support members in identifying and disclosing relevant information.

Declaration of Interests		
Areas where there may be a conflict of interest	Direct Interests of Member <i>Complete details of any relevant personal interests you may have. This should include any financial interests you may have. If you do not have anything to declare, write 'none'.</i>	Indirect Interests of a Member's Close Relative <i>Complete details of any relevant personal interests your close relatives may. This should include any financial interests they may have. If none of your close relatives have any interest for you to declare, write 'none'.</i>
<b>Directorships</b> Are you a Director in any other organisation. Give the name and company of the organisation(s) if any.		
<b>Shareholdings</b> Do you have 5% or more shareholdings in a public or private limited company or any other organisation.		
<b>Trusteeships</b> Are you a trustee or manager of any charity or voluntary organisation. Give the name of the organisation, its company and charity numbers.		
<b>Paid Work</b> Any paid jobs of freelance work as a consultant. Give the name of the organisation and your role.		

<b>Professional bodies</b> Any professional, regulatory or statutory bodies you are member of including trade or other associations.		
<b>Public appointments</b> State whether you have any public appointments such as a non-executive member on a board or advisory committee		
<b>Political Interests</b> You only need to include political affiliation that are on public record		
<b>Other interests</b> State any other interests you may have		
<b>Gifts and/or Hospitality</b> State here if you have received any gifts or hospitality from anyone (See the TEC Ethics Policy and Ethical Gift Policy)		

**Statement**

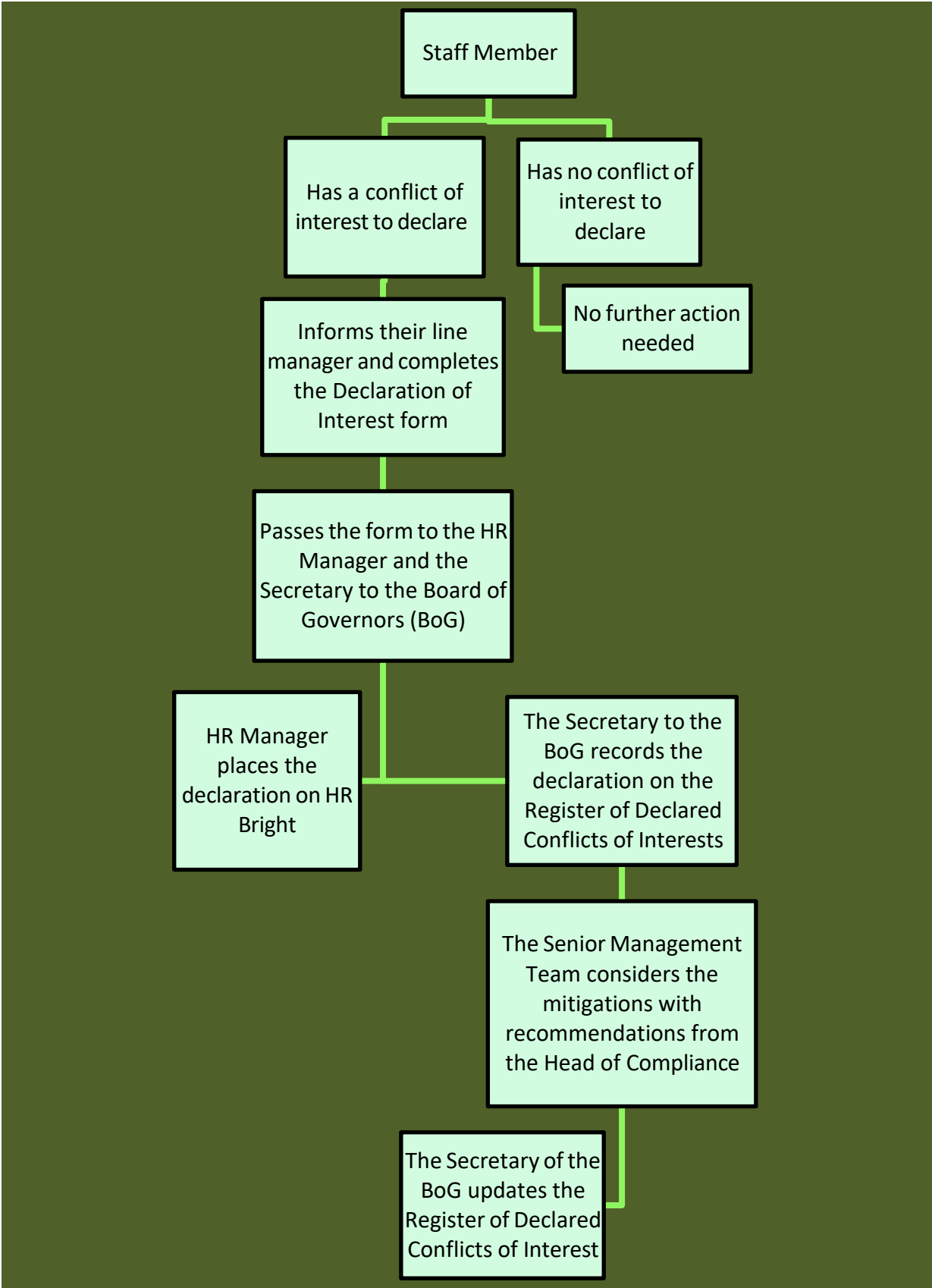
All members of the any of the boards and committees at Trent Education Centre (TEC) agree to avoid using their influence on the board or committee for their personal gain in such a way that might be considered an abuse of their position and responsibility. All members commit to acting with integrity, making fair, honest and transparent judgements for the good of TEC, its students, staff and other stakeholders as well as for the benefit of the wider public. In particular, board and committee members are expected to make reasonable effort to ensure that TEC uses any public funds it may receive to give value for money through TEC’s provision of high-quality education and all its related services.

**To the best of my knowledge, I have declared all my interests and agree to the statement above**

<b>Name (Print):</b>	
<b>Signed:</b>	
<b>Date:</b>	

**Please return this by email to the chair and secretary of the relevant board or committee and to the Head of Compliance.**

**Appendix 4: Staff Declarations of Interests Flowchart**



**Appendix 5: Board and Committee Members Declarations of Interests**

